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May 1, 2020

Honorable Philip M. Halpern
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Dana Stephenson v. Exclusive Motor-Sports LLC, Exclusive Motor Sports & Collision Center LLC, Exclusive Motor Cars LLC and Bethpage Federal Credit Union*
Docket No. 7:20-cv-01332-PMH

Dear Judge Halpern:

Our firm was retained this week by Exclusive Motor-Sports LLC, Exclusive Motor Sports & Collision Center LLC and Exclusive Motor Cars LLC, defendants in the above-captioned matter ("the Exclusive Motor defendants"). I am writing to request an extension of time to answer or move with respect to the plaintiff's complaint to June 1, 2020.

The current deadline for the Exclusive Motors defendants' to respond to the Complaint was on or about March 30, 2020. We understand that before we were retained, our clients had engaged in discussions with counsel for the plaintiff, and that an informal extension to respond to the complaint to April 30 had been given. As we were only recently retained, and given the constraints imposed as a result of the COVID-19 pandemic, an extension to June 1 will give us the time we need to review and investigate with our clients the allegations contained in the complaint and respond appropriately. Plaintiff's counsel has consented to this request and we have agreed not to assert any defense that our clients were not personally served with the summons and complaint. Your Honor granted a similar request made by counsel for co-defendant, Bethpage Federal Credit Union.

We are not aware of any scheduled dates in this matter that will be affected by an extension. The Court's attention to this matter is greatly appreciated.

Very truly yours,


David L. Darwin

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cc: counsel of record via ECF filing